



February 22, 2024

Tabby Vangelder, Treasurer  
Public School Employees Staff Organization  
33530 1st Way S, Suite 102  
Federal Way, WA 98003-6200

Case Number: 530-6025766( )  
LM Number: 543140

Dear Tabby Vangelder:

This office has recently completed an audit of Public School Employees Staff Organization under the Compliance Audit Program (CAP) to determine your organization's compliance with the provisions of the Labor-Management Reporting and Disclosure Act of 1959 (LMRDA). As discussed during the exit interview with you, President Christopher Mobley, and Kris Mott on February 14, 2024, the following problems were disclosed during the CAP. The matters listed below are not an exhaustive list of all possible problem areas since the audit conducted was limited in scope.

#### Recordkeeping Violations

Title II of the LMRDA establishes certain reporting and recordkeeping requirements. Section 206 requires, among other things, that labor organizations maintain adequate records for at least five years by which each receipt and disbursement of funds, as well as all account balances, can be verified, explained, and clarified. As a general rule, labor organizations must maintain all records used or received in the course of union business.

For disbursements, this includes not only original bills, invoices, receipts, vouchers, and applicable resolutions, but also documentation showing the nature of the union business requiring the disbursement, the goods or services received, and the identity of the recipient(s) of the goods or services. In most instances, this documentation requirement can be satisfied with a sufficiently descriptive expense receipt or invoice. If an expense receipt is not sufficiently descriptive, a union officer or employee should write a note on it providing the additional information. For money it receives, the labor organization must keep at least one record showing the date, amount, purpose, and source of that money. The labor organization must also retain bank records for all accounts.

The audit of Public School Employees Staff Union's 2022 records revealed the following recordkeeping violations:

1. Union Disbursements

Public School Employees Staff Union did not retain adequate documentation for

disbursements paid by union officers totaling at least \$7,626.08. For example, the union did not retain any backup documentation for 24 disbursements totaling at least \$7,626.08. In addition, there was no union purpose documented for at least 17 disbursements totaling at least \$7,101.16.

As noted above, labor organizations must retain original receipts, bills, and vouchers for all disbursements as well as documentation showing the nature of the union business requiring the disbursement. The president and treasurer (or corresponding principal officers) of your union, who are required to sign your union's LM report, are responsible for properly maintaining union records.

## 2. Disposition of Property

Public School Employees Staff Union did not maintain an inventory of shirts and other property it purchased, sold, or gave away. The union must report the value of any union property on hand at the beginning and end of each year in Item 30 (Other Assets) of the LM-3. The union must retain an inventory or similar record of property on hand to verify, clarify, and explain the information that must be reported in Item 30. The union must record in at least one record the date and amount received from each sale of union shirts and other items. In addition, in the case of items given away to members, the union must retain records that identify the date the items were given away and the recipients of those items.

## 3. Failure to Record Disbursements

Public School Employees Staff Union did not record in its disbursement records at least seven disbursements totaling at least \$538.19. For example, a withdrawal totaling \$250 was not recorded in the union records. Union disbursement records must include an adequate identification of all money the union disburses. The records should show the date and amount disbursed, and the union business requiring the disbursement.

## 4. Check Numbers not Recorded

Public School Employees Staff Union did not record check numbers for disbursements made by check in its disbursement journal. In addition, the dates in the disbursement journal for check disbursements were not the dates the checks were printed. Union disbursement records must identify the source and date of disbursements.

Based on your assurance that Public School Employees Staff Union will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

I want to extend my personal appreciation to Public School Employees Staff Organization for the cooperation and courtesy extended during this compliance audit. I strongly recommend that you make sure this letter and the compliance assistance materials provided to you are passed on to

future officers. If we can provide any additional assistance, please do not hesitate to call.

Sincerely,



Investigator

cc: Christopher Mobley, President